DHHS HIPAA PMO Business Operations Plan – Goals

- Establish HIPAA PMO Business Operations Team (Note: Team Leader has been hired but other staff hiring delayed due to budget constraints)
- Develop and/or revise DHHS policies, general statutes and/or rules promulgated by Commissions in DHHS to comply with HIPAA requirements, utilizing an enterprise approach for DHHS policies whenever feasible, and involvement by appropriate governmental agencies, advocacy groups and citizens at large
- Integrate security and privacy processes into routine business operations in order to achieve a security/privacy life cycle containing the following components: Risk Assessment, Policy Development, Implementation, Administration and Audit
- Ensure patient/client understanding of the DHHS enterprise information security efforts and patient/client rights in relation to access to health information
- Develop an enterprise-wide security/privacy program to ensure that sufficient focus and resources are allocated to plan and implement the program
- Promote atmosphere for sharing deliverables within DHHS, throughout the state and around the country
- Provide deliverables that will meet the business operation needs of DHHS agencies and practically blend together the business and technical areas of the agencies
- Ensure that business operations and processes contribute to compliance with standard data transactions, code sets and national identifiers
- Ensure compliance with HIPAA rules and standards

Planned Deliverables

- Tools to Assess Business Impact
  - Information Flow Database
    - Information coming in, going out and/or being stored by an agency
    - Type of information (e.g., demographics, assessments, HIV, substance abuse, diagnostic) with associated level of risk
    - Who sends or receives the information and how the information is transmitted (e.g., diskette, phone, fax, US Mail, electronic transactions)
    - How is information stored or disposed (e.g., automated system, shredded, file area)
  - Questionnaires for impact assessment, gap analysis, identification of business associates
  - Process for review of statutes, rules, policies, procedures that relate to HIPAA
- Promote utilization of Business Process Reengineering
- Develop Best Practice models
  - Security of healthcare information in both paper and electronic media
  - Remote access to healthcare information
  - Determining access rights to systems
- Development of administrative materials:
  - Develop DHHS enterprise-wide policies, forms, notices, contracts whenever feasible
  - When enterprise-wide materials are not feasible, develop models that agencies/ institutions can use for internal development
  - Work with DHHS Division of Human Resources on Personnel Policy revisions and potential job classifications for Security, Privacy and Compliance Officers

- Administrative materials will include:
  - Policies required under HIPAA
  - Authorization for Release of Information
  - Notice to Clients
  - Chain of Trust Agreements
  - Business Continuation Plan Models
  - Employee Forms (Entry, During, Separation)
  - Revisions to Record Retention and Disposition Schedules
  - Training Tools (Initial and Reinforcement)
  - Risk Management Plans
  - Self-certification Tools

Relationships with Local Agencies/Institutions

Identify meetings/groups comprised of local agency/institution staff with HIPAA interests such as:
- NC Association of Local Health Directors, Technology Committee
- NC Health Information Management Association, Behavioral Health Section
- HEARTS User Group

  Once meetings/groups are identified, PMO staff or HIPAA Coordinator may try to attend meetings and make presentations or review potential agenda items with contact person and provide necessary materials.
- Local agencies/institutions need to provide PMO with list of contacts for EDI, Security and Business Operations so communications can be sent directly to the contacts
- PMO will forward deliverables from focus groups (EDI, Security, Business Operations) to designated local agency/institution contacts
- PMO website http://dirm.state.nc.us/hipaa/ will be the primary vehicle for communication. Methods of communication include:
  - Agenda and Minutes (Focus Groups, HIPAA Coordinators, GIVES)
  - Deliverables from Focus Groups and PMO Teams
  - Presentation Materials
  - FAQ's
  - Helpful Tools (developed by PMO and other organizations)
  - Other HIPAA Resources
- If local agencies/institutions wish to form regional focus groups, PMO staff will assist with agenda preparation and presentation of materials

ROLES AND RESPONSIBILITIES
of
Local Agency HIPAA Coordinators

- Become familiar with the primary aspects of the Health Insurance Portability and Accountability Act (HIPAA) (some useful websites include: http://aspe.os.dhhs.gov/admnsimp/   http://dirm.state.nc.us/hipaa/ http://pweb.netcom.com/~ottx4/HIPAA.htm   http://www.nchica.org/ http://www.smed.com/hipaa/index.php)
- Coordinate HIPAA awareness training for staff within the local agency with assistance from the Department of Health and Human Services (DHHS) Divisional HIPAA Coordinator and DHHS Program Management Office (PMO).
- Serve as agency's primary portal of communications about HIPAA-related activities to ensure that agency staff are informed of the current status, plans and requirements for HIPAA compliance.
- Coordinate other training opportunities related to the HIPAA regulations for agency staff.
- Facilitate the planning, development and execution of HIPAA related activities within the local agencies:
  - Be focal point for local agency's HIPAA planning tasks.
  - Development and monitoring of work plans utilizing the model plan provided by the DHHS HIPAA PMO.
  - Assemble local agency staff for compliance monitoring, user acceptance testing (when needed), review of deliverables from the DHHS HIPAA PMO and implementation of deliverables within the local agency.
  - Coordinate local agency's HIPAA impact analysis, risk assessments, and internal policy and procedure development.
  - Identify all local agency systems/programs that may contain billing or client specific information (local agencies do not need to address systems supported by DHHS).
- Report ongoing local agency HIPAA compliance planning and execution to Divisional HIPAA Coordinator utilizing the formal status reporting format developed by the DHHS HIPAA PMO.
- Respond to and complete requests for HIPAA related activities from the Division HIPAA Coordinator or DHHS HIPAA PMO in a timely manner.
- Funding:
  - Determine local agency's budgetary needs for HIPAA compliance and submit to Division HIPAA Coordinator upon request.
  - Monitor local agency's HIPAA compliance budget and identify additional budgetary requirements.
- Delegate tasks to other staff within the local agency as needed for assistance on HIPAA project.
- Participate in regional or statewide meetings/conferences that may be planned through the Division HIPAA Coordinator and/or DHHS HIPAA PMO.